UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

000$0

REPLY TO THE ATTENTION OF

MAR 19 1998

HSE-5J

MEMORANDUM

DATE:

SUBJECT: ACTION MEMORANDUM - Request for a time critical removal action at the Celotex Plant site, Wilmington, Will County, Illinois

FROM: Fred Bartman, On Scene Coordinator
Emergency Response Section II

THRU: Donald Bruce, Chief
Emergency Response Section II

TO: Rick Karl, Chief
Emergency Response Branch

Site ID# :B524

I. PURPOSE

The purpose of this Action Memorandum is to request your approval of funds in the amount of $71,966 for a time critical removal action at the Celotex Plant (CP) site in Wilmington, Will County, Illinois. A time critical removal action is necessary to abate an immediate threat to public health and the environment caused by the presence of drums and other containers with flammable and corrosive material. There is also friable abestos containing material (ACM) scattered throughout the property. The proposed removal action includes the removal of friable asbestos,drums and other containers. The proposed removal action is estimated to cost $71,966 of which $53,086 will be used towards Emergency Response Contractor Services (ERCS).

The proposed removal action will abate the potential release of "hazardous substances," as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9601(14), by stabilizing, removing, and/or disposing of such substances pursuant to the authority set forth at Section 104(a) of CERCLA, 42 U.S.C. § 9604(a).

The site is not on the National Priorities List (NPL).

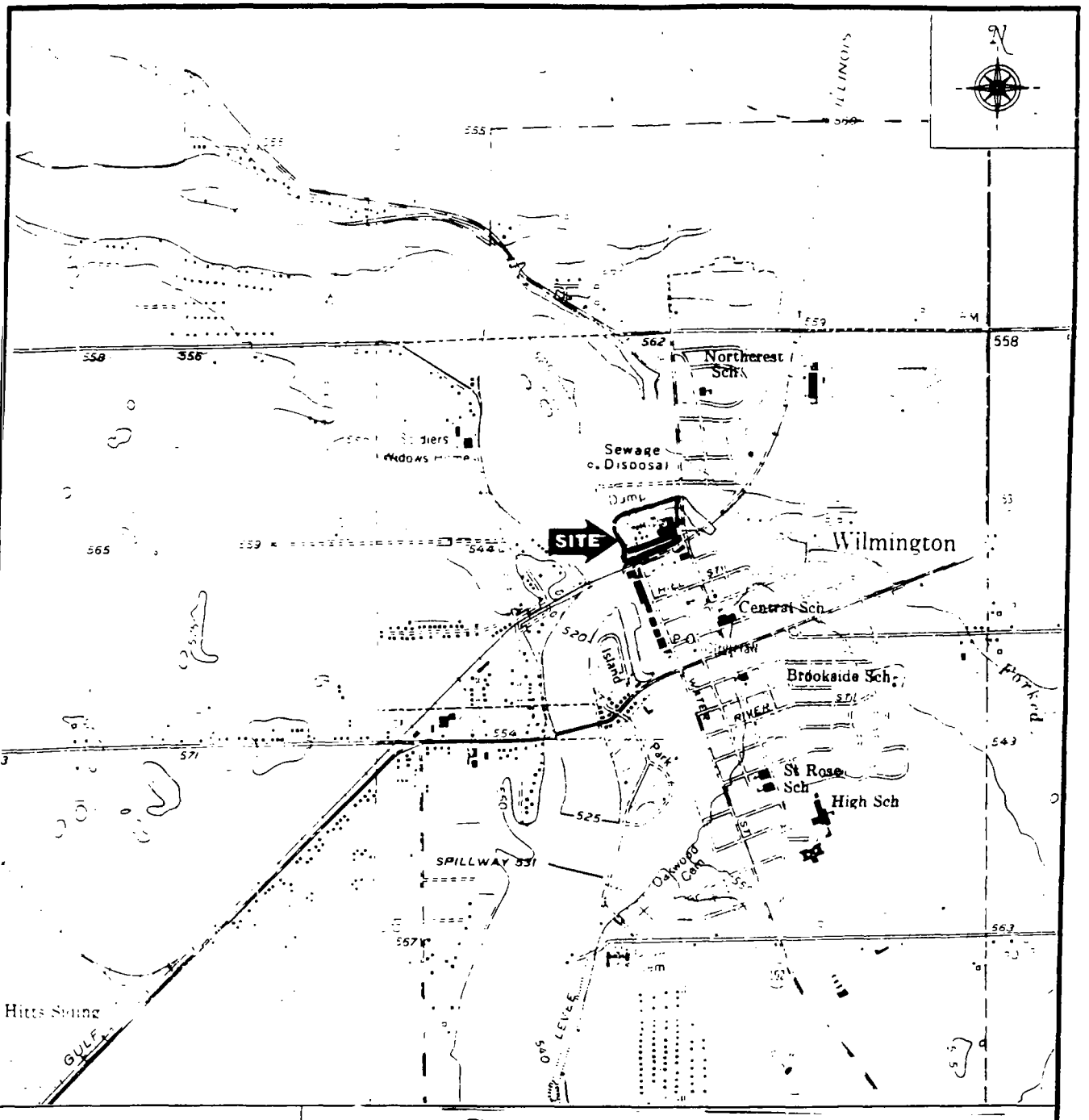
II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILD981961634

A. Location & Background

The site is located at the northwest corner of Kankakee Street and Chicago Street in Wilmington, Illinois, at geographic coordinates: latitude 41°18'76.8" N and longitude 88°08'95.5" W. The site is bordered on the north by Forked Creek, on the west by the Kankakee River, on the south by Chicago Street and to the east by Kankakee Street and more industrial facilities (See Figures 1&2). The site is partially surrounded by a chain-linked fence but public access is possible through the fence and many holes in the exterior of the building and the facility gate is not secured. According to an EJ Study (Attachment I), the Celotex Plant is in a low income or minority area at or greater than the state average.

The Celotex Plant was constructed in the late 1950's to be used for production of roofing materials and as a paper mill.Celotex Corporation ceased operations in the early 1980's. Most of the facility was purchased by other parties. Numerous complaints by residents of Wilmington concerning the condition of the facility initiated investigations to determine whether hazardous wastes are present at the facility. An inspection in 1994 showed that approximately thirty 55-gallon drums were present, some of which were leaking unknown materials with a "solvent odor." The owner was cited by the Illinois Environmental Protection Agency (IEPA) in 1994 for numerous violations regarding dumping at the site and storage of suspected hazardous waste materials. No apparent actions resulted from these citations. The buildings have been used for gang related activities and gang graffiti is present on

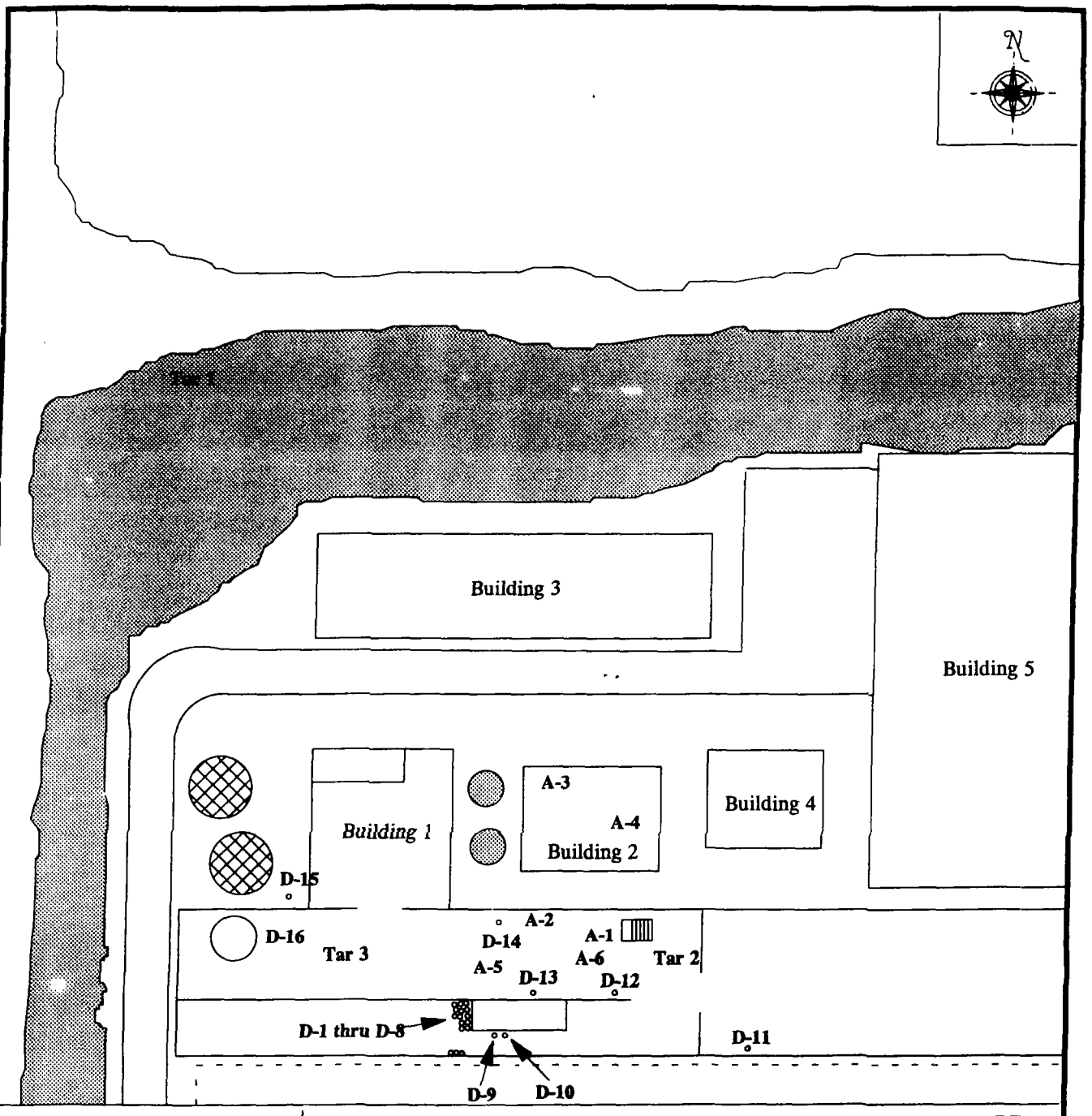


Quadrangle location

EPA U.S. EPA Region 5

EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

TITLE	Site Location Map	FIGURE	1
SITE	Celotex	SCALE	1:24,000
CITY	Wilmington STATE Illinois	TDD	S05-9709-007
SOURCE	U.S.G.S. 7.5 minute series Topographical Map Wilmington, Illinois Quadrangle	DATE	1954
		REVISED	1973



Legend

A - Asbestos sample

D - Drum sample

Tar - Tar/asphalt sample

Note: Samples A-1, A-5, *A-6, Tar 2, and Tar 3* located in the basement

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EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

TITLE	Sample Location Map	FIGURE	2
SITE	Celotex	SCALE	Not to scale
CITY	Wilmington	STATE Illinois	TDD S05-9709-007
SOURCE	ecology and environment, inc.	DATE	1997

outside walls.

The site,of approximately six acres, contains five steel buildings(designated 1 through 5) and three concrete, above ground, wastewater clarifiers. The buildings are in poor condition with broken windows and deteriorating roofs, and contain miscellaneous equipment and debris. Building 1 has been used by the City of Wilmington for equipment storage, and currently has approximately thirty 55-gallon drums stored inside. Buildings 2, 3, and 4 are empty exvept for miscellaneous debris, including insulation suspected of containing asbestos. A section of Building 3 was used by a local artist as a workshop. Building 5 is apparently used for storage by a trucking firm. A landfill containing asphalt materials used by the Celotex corporation is located in the northwest section of the site, adjacent to the Kankakee River. The landfill was the source of numerous fires when Celotex was in operation. Bundles of shingles have also been observed half buried along the south bank of Forked Creek. The extent of the asphalt runs all along Forked Creek and along most of the Celotex property that runs along the Kankakee River. Another landfill, of approximately 40 acres, exists north of the Forked Creek. (This area was not included in this action).

B. Removal Site Assessment

On September 26, 1997, USEPA and START mobilized to the site to conduct a removal site assessment. At 1000 hours a site reconnaissance was performed to determine the condition of the buildings and to identify sample collection areas. Building 1 is the largest building on site and is in the worst condition of all the buildings, with crumbling interior walls and a deteriorated roof. All 55-gallon drums found on site were in Building 1. Building 2 is a small corrugated steel structure located north of Building 1. Garbage bags containing asbestos insulation were observed in the northwest corner of the building. Inside Building 3 were various pieces of machinery as well as desks, and other debris from the previous business that leased the building. A section of Building 3, was being utilized by a local artist as a workshop. All entrances to building 4 were boarded up and the building could not be entered during the site assessment. Building 5, is currently used by a trucking company and was not entered. An asphalt mass, estimated to contain 30,000 cubic yards of material was present in the northwest corner of the site

in the old landfill, adjacent to the Kankakee River and all along the Forked Creek up to the Kankakee Street Bridge. In all, over 1000 feet of the river and creek bank had asphalt either in the water or near the water, that at times of high water levels could be inundated. An oil sheen was observed on the water surface adjacent to the asphalt material. In addition to the ashphalt in the old landfill there were two additional masses on the property as well as a layer of asphalt covering the basement floor. Samples were collected from 55-gallon steel drums, which were located in Building 1. Using a drum thief, sample D-1, a thick brown liquid was collected from a drum in the south central side of Building 1 ; air monitoring of the drum contents indicated no elevated PID or CGI readings. Using a drum thief, sample D-2, a clear yellowish/brown liquid, was collected from a drum in the south central part of Building 1; air monitoring of the drum contents indicated no elevated PID or CGI readings. Using a drum thief, sample D-3, a clear orange/yellow liquid, was collected from a drum in the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-4, a thick brown liquid, was collected from a drum on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-5, a thick brown liquid, was collected from a drum on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-6, a light brown liquid, was collected from a drum on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-7, a clear, viscous liquid, was collected from a drum on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a stainless steel trowel, sample D-8, a white powder, was collected from a drum on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-9, a thick brown liquid, was collected from a 5-gallon pail on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-10, a thick brown liquid, was collected from a 5-gallon pail on the south central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-11, a cloudy brownish liquid, was collected from a drum on the south east corner of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-12, a brown oily liquid,

was collected from a plastic drum on the north central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-13, a brown oily liquid, was collected from a drum on the north central side of Building 1; air monitoring indicated a maximum PID reading of 2000 parts per million (ppm), there was no elevated CGI reading. Using a drum thief, sample D-14, a thick brown liquid, was collected from a drum on the north central side of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a drum thief, sample D-15, a thick brown liquid, was collected from a drum on the west side outside of Building 1; air monitoring indicated no elevated PID or CGI readings. Using a stainless steel trowel, sample D-16, a white crystalline solid, was collected from a tank on the northwest corner of Building 1; air monitoring indicated no elevated PID or CGI readings. Sample D-17 was collected from a composite of drums 2, 3, 9, 10, 12, and 13. Sample Tar-1 was collected from the asphalt pile adjacent to the Kankakee River. Sample A-1, an asbestos like material, was collected in the basement of Building 1 on the north central side. Sample A-2, an asbestos like material, was collected on the main floor of Building 1 on the north central side. Sample A-3, an asbestos like material, was collected in the northwest corner of Building 2. Sample A-4, an asbestos like material was collected on the east side of Building 2.

On December 11, 1997, USEPA and START returned to the site and took a sample of the asphalt and asbestos in the basement of Building 1. Samples Tar 2 and Tar 3 were taken in the basement of Building 1 and were a black asphalt like substance. Samples A-5 and A-6 were taken from pipe wrap in the basement. The drum samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), Resource Conservation and Recovery Act (RCRA) metals, F-listed solvents, pH, and flash point. The tar sample was analyzed for SVOCs, Toxicity Characteristic Leaching Procedure (TCLP) metals, PCBs, and asbestos. Samples A-1 through A-4 were tested for asbestos only. A summary of selected results are in the site assessment.

The pHs of samples D-1, D-4, D-5, D-6, D-7, and D-16 exceeded 12.5 (standard units), and therefore exhibit the characteristic of corrosivity, and designate these wastes as hazardous. The flash points of D-2, D-13, and D-14 were all less than 140 °F;

the contents of these drums are considered hazardous waste, having exhibited the characteristic of ignitability. PCBs were detected in sample Tar 3 at 10 parts per million (ppm). Samples A-1, A-3, and A-4 tested positive for asbestos using polarized light microscopy.

Samples Tar 2 and Tar 3 were analyzed for polynuclear aromatic hydrocarbons (PAHs), PCBs, and RCRA Metals. Samples A-5 and A-6 were tested for asbestos.

B. Other Actions to Date

The site owner was cited by IEPA in 1994 for the illegal storage of hazardous waste.

C. State and Local Authorities Role/Actions

On September 9, 1997, the IEPA requested USEPA's assistance on the Celotex Plant property. The IEPA did not request assistance for the landfill property. The City of Wilmington is interested in redeveloping this land and initially referred the site to the State. It is unlikely that the State of Illinois or the City of Wilmington will contribute funding towards the cost of the removal.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The National Contingency Plan (NCP), at 40 C.F.R.§ 300.415(b)(2)(i) through (vii), provides specific criteria for evaluation of a threat and the appropriateness of a removal action.

The CP site meets the NCP criteria for a time-critical removal action. Observations documented during the initial and follow-up visits to the site (as described above) establish the presence of the risk factors set forth at 40 C.F.R. § 300.415(b)(2)(i), (iii), (v) and (vi), each of which is discussed below:

- **Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chains.** Analytical results from the drum samples collected on September 26, 1997, indicate the presence of hazardous substances at the Celotex site. Both ignitable and corrosive liquids were found in drum samples. Highly caustic liquids exist in samples D-1, D-4, D-5, D-6, D-7, and D-17. If ingested, caustic liquids can cause internal lesions and edema. Death can result due to the potential complications such as asphyxia, shock, hemorrhage, or infection. Dermal exposure to less concentrated caustic solutions can cause irritation and dermatitis. Asbestos was also found in open bags and represents a carcinogenic threat to exposed populations. Because the Celotex facility is unsecured and located within the City of Wilmington, nearby residents can be exposed to hazardous materials present on site.

- **Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.** USEPA observed approximately 20 55-gallon drums during the site reconnaissance. The drums contain liquids that exhibit both corrosive and ignitable characteristics. Some drums appeared to have already leaked contents or will soon leak due to the poor condition of the drums.

- **Weather conditions that may cause pollutants or contaminants to migrate or be released.** All on-site contaminants are found in buildings with roofs that are in a deteriorated state and could allow migration of contaminants due to the weather. Exposure to the weather can result in additional degradation of the 55-gallon drums,

which could cause further migration of contaminants if hazardous substances leaked.

- **Threat of fire or explosion.** Paragraph (a)(1) of Section 261.21 of 40 CFR states that a substance that exhibits a flash point less than 140 °F is ignitable. Samples D-2, D-13, and D-14 have flash points of 134 °F, 81 °F, and 67 °F, respectively, and are therefore ignitable substances.

In addition to the threats described above, there is an estimated 30,000 cubic yards of tar, asphalt and asphalt shingles in or very near the Kankakee River and Forked Creek. A sheen is consistently present in warm weather. A removal action is planned to address this release under the Oil Pollution Act (OPA) under a separate request.

IV. ENDANGERMENT DETERMINATION

Actual or potential releases of hazardous substances from this site, as described in Sections II and III above, if not addressed by implementation of the response action described in this Action Memorandum, may present an imminent and substantial endangerment to public health or welfare or the environment.

V. REMOVAL ACTION AND ESTIMATED COSTS

The time critical removal action at the CP site will consist of the following activities:

1. Securing the site during the course of removal activities;

2. Preparation and implementation of the site workplan and safety plan;

3. Identification and disposal of drums and other containers;

4. Removal and disposal of all friable ACM;

5. Removal and disposal of tar/asphalt in the basement and other areas containing hazardous substances;

6. Decontamination and possible disposal of building structures and other debris in the basement area;

7. All work to be done in accordance with all state and federal regulations to the extent practicable including the USEPA Off-Site Rule at 40 CFR 300.440, 58 Federal Register 49215 (September 22,1993).

The estimated cost and the removal project ceiling is as follows:

Emergency Response Contract Services:	$ 39,323
Contractor Contingency (20%)	7,865
Site Contingency (15%)	5,898
Total ERCS Cost	$ 53,086
Government Cost	$ 16,417
Site Contingency (15%)	2,463
Total Government Cost	$ 18,880
Removal Project Ceiling	$ 71,966

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not pose a burden on the affected property disproportionate to the extent to which that property contributed to the conditions being addressed.

On-site treatment of hazardous substances found at the site was not cost effective or practical because of the relatively small quantity of waste. The additional start up and equipment costs associated with on-site treatment would not have been offset by savings in transportation and disposal costs.

Federal and state ARARs determined to be applicable to the site are the RCRA requirements governing the handling, transportation and disposal of the hazardous waste. All ARARs of federal and state law will be complied with to the extent practicable.

The total estimated cost associated with the above proposed removal action is $71,966 of which up to $53,086 was allotted to ERCS contractor costs. A detailed estimate of removal costs is presented in Attachment II.

VI. EXPECTED CHANGE IN SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

By not implementing the proposed removal action, the public will continue to be potentially exposed to corrosive, flammable and toxic substances.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum (Attachment III).

X. RECOMMENDATION

This decision document represents the selected time critical removal action for the Celotex Plant site in Wilmington, Will County, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision was based upon the Administrative Record for the site (Attachment IV). Conditions at the site met the criteria for a removal as set forth in the NCP at 40 C.F.R. § 300.415(b)(2)(I) through (vii) and, therefore, I recommend your approval of the proposed removal action. The total project ceiling, if approved,

will be $71,966. Of this, an estimated $53,086 can be used towards cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard C Karl DATE: 3-19-96
Chief, Emergency Response Branch

DISAPPROVE: _____ DATE: _____
Chief, Emergency Response Branch

Attachments
I. Environmental Justice
II. Detailed Cost Estimate
III. Enforcement Confidential Addendum
IV. Administrative Record Index

cc: K. Mould, EPA HQ, 5202G
Don Henne, Regional Environmental Officer
U.S. Department of Interior, Room 217
200 Chestnut Street, Philadelphia, PA 19106
B. Everetts, IEPA

PAGE 12

BCC PAGE

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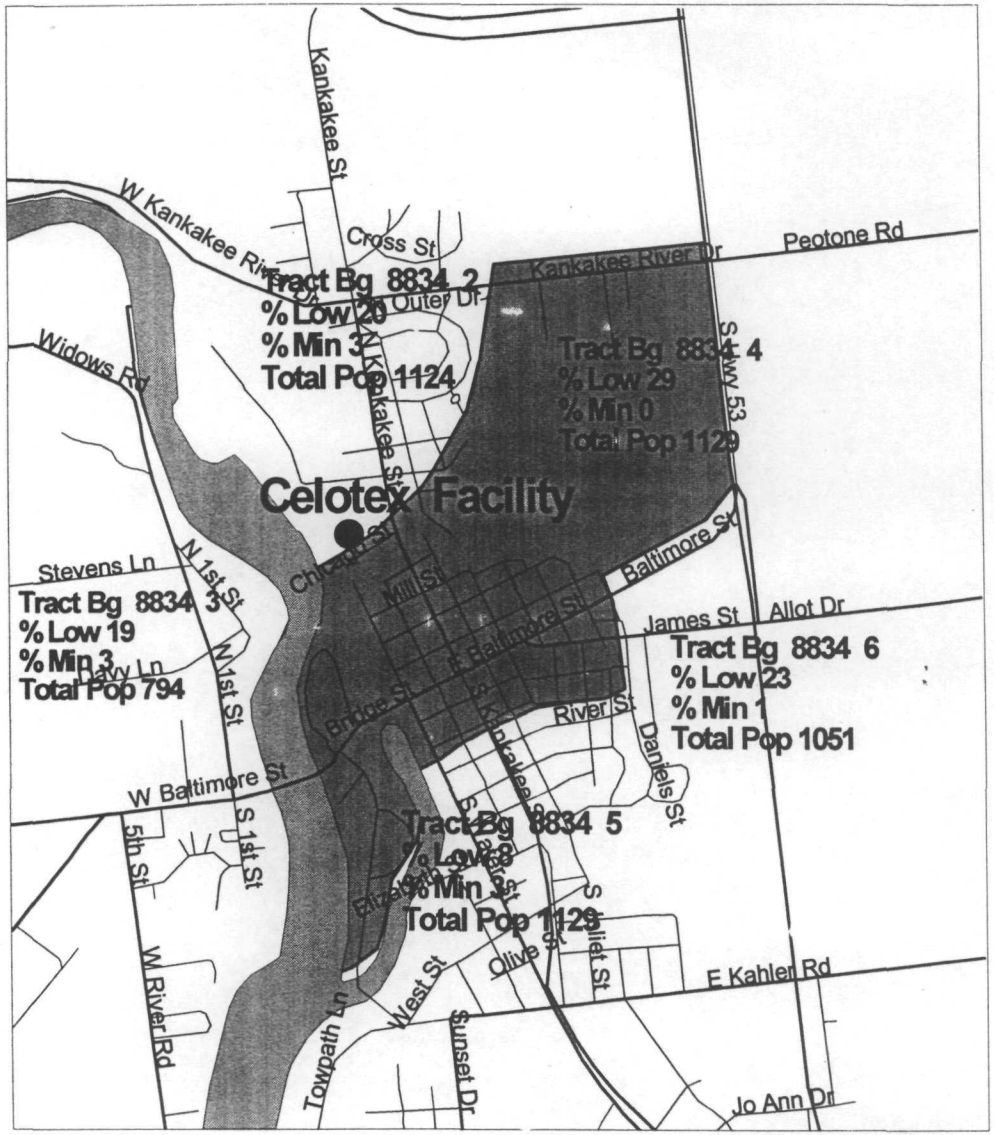
NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

Celotex Facility Wilmington, IL



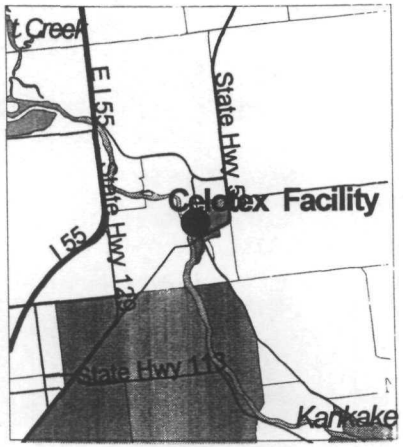
EJ Study

EJ2

- Facility

EJ Identification

- Low Income and Minority Less than State Average
- Low Income or Minority at or Greater than State Average
- Low Income or Minority 2 Times or Greater than State Average



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0.8 0 0.8 1.6 Miles

U.S. EPA Region 5, Superfund GIS

Date of Map: 2/26/98

Source of Map: CERCLIS 3 Database

ATTACHMENT II

Cost Summary

Projection Name: Baseline.EQM
Projection Type: Initial
Date: 02/27/98
Prime Contractor: EQ5

		Projection	Archive	Total
CONTRACTOR				
	Personnel Cost	16132	0	16132
	Equipment Cost	2851	0	2851
	Other Direct Cost	20340	0	20340
	Total for Contractor	39323	0	39323
	Contractor Contingency:20.00%			7865
	Including Contractor Contingency			47188
	Site Contingency:15.00%			5898
	Including Site Contingency			53086
GOVERNMENT				
	Personnel Cost	14441	0	14441
	Equipment Cost	0	0	0
	Other Direct Cost	1976	0	1976
	Total for Goverment	16417	0	16417
	Site Contingency: 15.00%			2463
	Including Site Contingency			18880
PROJECT TOTAL				71966

Cost Summary

Projection Name: Baseline.EQM
Projection Type: Initial

Date: 02/27/98
Prime Contractor: EQ5

CONTRACTOR		
	Personnel Cost	16132
	Equipment Cost	2851
	Other Direct Cost	20340
	Total for Contractor	39323
	Contractor Contingency: 20%	7865
	Including Contractor Contingency:	47188
	Site Contingency: 15%	5898
	Including Site Contingency:	53086
GOVERNMENT		
	Personnel Cost	
	EPA	9695
	TAT	4746
		14441
	Equipment Cost	0
	Other Direct Cost	
	EPA	210
	TAT	475
		1976
	Total for Government	16417
	Site Contingency: 15%	2463
	Including Site Contingency:	18880
PROJECT TOTAL		71966

CONTRACTOR/GOVERNMENT
EQUIPMENT/PERSONNEL BY CLIN
OTHER DIRECT COSTS

6 PAGES

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT #3
ENFORCEMENT CONFIDENTIAL ADDENDUM
CELOTEX SITE
MARCH 1998

1 PAGE

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

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ATTACHMENT IV
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
CELOTEX PLANT SITE
WILMINGTON, WILL COUNTY, ILLINOIS

ORIGINAL
03/03/98

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	Undated	IEPA	USEPA	Screening Site Inspection Report	105
2	Undated	IEPA	USEPA	Screening Site Inspection Report: Analytical Results	121
3	Undated	IEPA	USEPA	Site Inspection Prioritization Report	30
	Undated	IEPA	USEPA	Site Inspection Prioritization Report: Analytical Results	219
4	09/08/97	IEPA	Bruce, D. USEPA	Letter re: assignment of an On-Scene Coordinator to the Celotex site	6
5	05/00/97	IEPA	USEPA	Site Team Evaluation Prioritization	44
6	05/00/97	IEPA	USEPA	Site Team Evaluation Prioritization: Analytical Results	213
7	Pending	Ecology & Environment	USEPA	Removal Assessment (PENDING)	
8	Pending	Bartman, F. USEPA	Karl, R. USEPA	Action Memorandum: Request for a time critical removal action at the Celotex Plant site, Wilmington, Will County, Illinois (PENDING)	